

## REMARKS

Reconsideration and the timely allowance of the pending claims, in view of the following remarks, are respectfully requested.

In the Office Action dated April 5, 2006, the Examiner rejected claims 29-31, under 35 U.S.C. §112, ¶2, as allegedly containing indefinite numbering; and rejected claims 1-4, 8-10, 18, 20, and 32, under 35 U.S.C. §103(a), as allegedly being unpatentable over Loopstra '791 (WO 98/40791) in view of Sato '930 (U.S. Patent No. 5,511,930).

The Examiner indicated that claims 28 and 33 were allowed. The Examiner objected to claims 5-7, 11-14, 19, and 21-25 but indicated that these claims as well as claims 29-31 would be allowable if rewritten in independent form. The Examiner also objected to the Title, Abstract, and Drawings.

By this Amendment, Applicants have amended the Title and have submitted a revised Abstract, thereby overcoming the objections to the Title and Abstract. As such, the immediate withdrawal of these objections are respectfully requested.

With respect to the Drawings, Applicants advise that formal drawings are currently being prepared and will be filed in due course.

Regarding the claim changes, claims 1, 4, 8, 13-14, 25, and 29-35 have been amended to provide a clearer presentation of the claimed subject matter and have cancelled claims 3 and 11-12 without prejudice or disclaimer. Applicants submit that no new matter has been introduced. Applicants point out that the claim changes correct the claim numbering problems thereby overcoming the §112, ¶2 rejections of claims 29-31. Accordingly, claims 29-31 are allowable, as acknowledged by the Examiner, and the immediate withdrawal of the rejections of these claims is respectfully requested.

Applicants further submit that the changes to claim 1 incorporate the features of claim 11, effectively rewriting claim 11 in independent form. As such, claim 1 is now allowable as acknowledged by the Examiner. And, because claims 2, 4-10, 13-25 depend, either directly or indirectly from claim 1, claims 2, 4-10, 13-25 are also patentable at least by virtue of dependency as well as for their additional recitations. Accordingly, the immediate withdrawal of prior art rejections of claims 1-2, 4-10, and 13-25 are respectfully requested.

Applicants respectfully traverse the prior art rejections of claim 32, under 35 U.S.C. §102(e), for the reasons presented below.

Independent claim 32, as amended, positively recites the use of a position disturbance correction system that counteracts gas movement-induced disturbances of a position of the substrate holder. Applicants submit that, as recited, the gas movement-induced disturbances are not merely functional limitations – rather, they identify a specific type of disturbance in which the disturbance correction system is configured to counteract.

Unlike the invention of claim 32, there is absolutely nothing in either the Loopstra '791 or Sato '930 references that teach the entire combination of features recited in claim 32, including the limitations discussed above. That is, as acknowledged by the Examiner, Loopstra '791 absolutely fails to teach the use of a position disturbance correction system. (See, Office Action: page 7). Moreover, in contrast to the Examiner's assertions, Sato '930 is incapable of curing this deficiency.

In particular, Sato '930 specifically discloses that the vibration and the *disturbance of posture* (i.e., yawing or pitching) of the conveying body 3 is attributable to the rolling of the base plate 4, which results *from the reaction force of the driving force*. To eliminate the influence of the reaction force, a second control means 8 is provided. (See, Sato '930: col. 8, lines 40-63).

In so doing, there is absolutely nothing in Sato '930 that teaches or suggests that the position disturbance correction system counteracts gas movement-induced

disturbances of a position of the substrate holder, as required by claim 32. If anything, Sato '930 only teaches the use of a second control unit to eliminate the disturbances caused by reaction forces.

For at least these reasons, Applicants submit that neither Loopstra '791 nor Sato '930 teach each and every element of the claimed combination of elements recited by amended claim 32. Accordingly, these references, whether taken alone or in combination, cannot render claim 32 unpatentable. Applicants, therefore, respectfully request the immediate withdrawal of the prior art rejection of claim 32.

All matters having been addressed and in view of the foregoing, Applicants respectfully requests the entry of this Amendment, the Examiner's reconsideration of this application, and the immediate allowance of all pending claims.

Applicant's Counsel remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this matter. If any point remains in issue in which the Examiner feels may be best resolved through a personal or telephone interview, please contact the Undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 03-3975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

**PILLSBURY WINTHROP  
SHAW PITTMAN LLP**



E. R. HERNANDEZ  
Reg. No. 47641  
Tel. No. 703 770.7788  
Fax No. 703 770.7901

Date: July 25, 2006  
P.O. Box 10500  
McLean, VA 22102  
(703) 905-2000